

M E M O R A N D U M

EPA Region 5 Records Ctr.



200019

DATE: 26 March 1992

SUBJECT: NPL SITE REMOVAL ASSESSMENT FOR HIMCO DUMP  
 FROM: Paul R. Luedman, OSC (name of site)  
 TO: Mark Messersmith (HSE-5J)

I have reviewed the data available for the above mentioned site, and have discussed it with R. Lance/Jim Smith (IDEM). Based upon (name of RPM or State PM) a site visit made by Robert Lance on 25 November 1991, (name of visitor(s)) (specific date) I have determined the following:

- (A) There is no imminent and substantial threat to the public health and welfare or to the environment, and that no removal action is appropriate at this time.
- (B) The following conditions exist on the site which warrant an immediate removal action:

Leachate analysis seeps noted on abutting neighbor's property and noted on the surface indicated sludges within a trench excavated at the seep location with: 50% pure Toluene, 6400 ppm Ethylbenzene, 29,000 ppm 2-Hexanone, 44,000 ppm Xylene, 17,000 ppm 2-Methyl-2-Pentanone as the primary constituents of the sludges and leachate; based on these analyses, a Removal Action including exploratory excavation in the area of this contaminant plume is indicated; first approach, 106 Order with 72 hour response time by the PRP.  
 I recommend that the following actions be taken:

- Tom Nash is the ORC representative for this facility
- Issue a 106 Order to Mr. Himes to conduct the removal with a 72 hour time for a positive response from the PRP.
- If no indication of PRP lead in the removal, EERB should conduct SA and initiate ERCS.

cc: RPM  
 R. Bowden (only if option B is indicated) ✓  
 D. Bruce, Chief, RS-II